

EXHIBIT A

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Attorneys for Walmart Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SEATTLE

COLBY THOMASON,

Plaintiff,

v.

WALMART INC.; a Multinational Retail
Corporation,

Defendant.

NO.

(SPOKANE COUNTY SUPERIOR
COURT CAUSE NO. 20-202349-32)

DECLARATION OF EDDY
SILVERMAN, ESQ., IN SUPPORT OF
WALMART INC.'S NOTICE OF
REMOVAL

I, Eddy Silverman, Esq., hereby declare and say:

1. That I am an attorney of the law firm of WILLIAMS, KASTNER &
GIBBS PLLC, and I am licensed to practice law in this Court.

2. I am over the age of eighteen and a U.S. citizen. I have personal
knowledge of the facts referred to in this Declaration and could competently
testify to these facts if called upon to do so in a court of law.

DECLARATION OF EDDY SILVERMAN, ESQ., IN SUPPORT OF
WALMART INC.'S NOTICE OF REMOVAL - 1

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(206) 628-6600

1 3. Along with Rodney L. Umberger, I represent WALMART INC.
2 (“Walmart”) in the above captioned lawsuit, and I am making this Declaration in
3 support of Walmart’s Notice of Removal to this Court.
4

5 4. This declaration is identifiable as **Exhibit A** to Walmart’s Notice of
6 Removal.
7

8 5. Attached hereto as **Exhibit B** is a true and complete copy of the
9 operative Complaint filed in state court in this matter.
10

11 6. Attached hereto as **Exhibit C** is a true and complete copy of
12 Plaintiff’s Response to Walmart’s RCW 4.28.360 Request for Statement of
13 Damages.
14

15 7. Attached hereto as **Exhibit D**, in accordance with LCR 101(c), are
16 true and complete copies of all additional records and proceedings filed in the
17 underlying action.
18

19 I declare under penalty of perjury under the laws of the United States and
20 of the State of Washington that the foregoing is true and correct.
21

22 DATED this 29th day of December, 2020.
23
24
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DECLARATION OF EDDY SILVERMAN, ESQ., IN SUPPORT OF
WALMART INC.’S NOTICE OF REMOVAL - 2

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1 WILLIAMS, KASTNER & GIBBS
2 PLLC

3 By s/Eddy Silverman
4 Eddy Silverman, WSBA No. 53494

5 *Counsel for Defendant Walmart Inc.*
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DECLARATION OF EDDY SILVERMAN, ESQ., IN SUPPORT OF
WALMART INC.'S NOTICE OF REMOVAL - 3

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